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October 25, 2021

VIA ECF

Hon. Paul A. Engelmayer
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Manuel Barro, et al v. Chokdee NYC Inc., et al
Docket No.: 20-cv-09615 (PAE) (SN)

Your Honor:

My office represents Plaintiffs in the above-captioned matter. I write to inform the Court on the status of the Parties' submission of the revised Settlement Agreement ("agreement" or "revised agreement") and to request a brief extension of time to submit the agreement. Defendants consent to the extension.

On October 12, 2021, the Court issued an Order directing the Parties to file a revised agreement specifying, in part, the portion of the settlement fund to which each named Plaintiff is entitled; the means by which each Plaintiff will receive that sum; and how the monthly payments will be disbursed. Our Office made the requisite changes, and on October 15, 2021, the undersigned sent the revised agreement to defense counsel. On that same day, defense counsel accepted the changes that our Office made to the revised agreement. On October 20, 2021, Plaintiffs signed the revised agreement.

On October 22, 2021, the undersigned sent an e-mail to defense counsel, asking him to send me a revised agreement, executed by Defendants, by today, October 25, 2021. I followed up with defense counsel today at 2:15 p.m. This evening, defense counsel notified me that Defendants need until Thursday, October 28, 2021, to sign the revised agreement.

In light of the foregoing, Plaintiffs respectfully request the Court to grant the Parties a short extension of time to submit the revised agreement, from today, October 25, 2021, to Friday, October 29, 2021.

Plaintiffs thank the Court for its time and consideration of this matter.

Respectfully submitted,

/s/ William K. Oates
William K. Oates, Esq.
MICHAEL FAILLACE & ASSOCIATES, P.C.
Attorneys for Plaintiffs

cc: Bingchen, Li, Esq. (via ECF)
Attorney for Defendants

Granted. SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge
10/26/2021